

OZARKS AREA COMMUNITY ACTION CORPORATION
OACAC WEATHERIZATION PROGRAM

Written Comments on Low Income Weatherization

1. OACAC agrees with the Energy Center's position on increasing monitoring for current and future years. However, OACAC objects to the Energy Center going back and monitoring previously monitored years (particularly doing monitoring of homes in the field), since the client may no longer live in the home that was weatherized or may have made changes to the home since weatherization had been performed or the client is deceased and the home is occupied by a new family. Also, any increase in monitoring for previous years would greatly impact OACAC's ability to meet production goals for the current program year.
2. OACA strongly disagrees with the Energy Center decision on limiting up front funding to no more than one month of funding and the decision to recapture the up front funding during the eighth month of the program year. Up front funding is necessary to be able to operate a program. The current system of two and one half months of operating expense or twenty percent of the total grant is an adequate amount to run a program.
3. OACAC strongly encourages the Energy Center to include the Policy Advisory Council (PAC) and the subgrantees in whatever communication forum is appropriate before implementing changes to the Low Income Weatherization Program in the State of Missouri.

Todd Steinmann, OACAC Weatherization Director, April 4, 2008

I support the Energy Centers efforts to promote and improve the Weatherization Assistance Program (WAP). The new state plan includes several noteworthy changes.

Specific items include:

1. Current PY Carryover. Allowing estimated carryover to be budgeted and included in the initial grant award (with later adjustments to reflect actual carryover) will enable subgrantees to improve program management and planning, resulting in better service to low-income Missourians.
2. Rental procedures. Increasing the rent increase restriction from one to two years along with requiring some level of contribution from landlords assures maximum energy benefit to clients and minimizes an undue enhancement for owners.
3. Expanded Monitoring Activities. Proposed monitoring activities will enhance the program with measureable credibility to the WAP and provide additional feedback and program improvement opportunities to subgrantees. At least some of the proposed monitoring changes appear to be the direct result of the State Audit of the WAP. While the audit did discover some important shortfalls it is important to put the audit findings in prospective. Based on total expenditures of over \$12 million (2 years) the finding primarily deal with less than \$50,000 which was already being addressed by the state. While these findings must be considered as significant I believe that enhanced and expanded monitoring efforts beginning with the current program year and moving forward will result in superior program improvements. Monitoring of activities completed three years ago serves little purpose unless specifically required by the state auditor.
4. Future Carryover. I support the EC goal of 100% expenditure of WAP funds by June 30, 2009. I would ask that the EC carefully evaluate production and expenditures in January 2009. In many cases subgrantees have multiple programs and activities within the Weatherization Department. Accordingly the capacity to complete weatherization activities can be and is adjusted throughout the year to complete weatherization and other activities. Since the various projects have differing time frames this often results in irregular production and expenditure levels.
5. Estimated Energy Savings. While many of the utility funded weatherizations require that energy savings be reported DOE does not require this information. I believe tracking estimated savings will be beneficial in leveraging additional dollars and documenting the credibility of the WAP. However I would ask the EC, along with the MACA Energy and Housing Professional Alliance, re-evaluate this reporting requirement prior to the development of next years state plan.

Terry Sanders
Housing Division Director
Ozark Action, Inc.
West Plains, MO 65775

April 3, 2008

RE: Weatherization Program

The following comments are in reference to the Low Income Weatherization State Plan:

1. MOCA understands the important of Department of Natural Resources Energy Center monitoring each subgrantee on a yearly basis. It would be very helpful to subgrantees if we could receive the results from the monitoring visits in a timely manner. When on-site visits to homes are performed and follow-up reviews are necessary as a result of a post DNR/EC inspection, it would benefit our agency and the client if this occurred in a timely manner.
2. Funding allocations is another concern for subgrantees. It would be very helpful if all grants from funding sources could be started at the beginning of the Weatherization Program Year. If the program year is July – June, it is very difficult to get a grant in February, and have adequate time administering the use of the grant by June 30th.
3. The last issue of concern is the involvement of the Policy Advisory Council. In prior years PAC has worked very closely with DNR/EC in providing valuable resources and knowledge in the development of policy. Our agency hopes this will continue, and PAC be given the opportunity to review proposed policies prior to meetings allowing PAC members to bring discussion and suggestions to the table.

Sincerely,

David Miller, CCAP
Executive Director